

DW-8J

September 24, 2003

CERTIFIED MAIL: 7099 3400 0000 9598 9952
RETURN RECEIPT REQUESTED

Mr. James Kreger
Director Technical Services/Compliance
US Liquids of Detroit, Inc
1923 Frederick Street
Detroit, Michigan 48211

RE: Draft Federal RCRA Permit
MID 980 991 566

Dear Mr. Kreger:

Enclosed is the draft of the Federal portion of the Resource Conservation and Recovery Act (RCRA) permit for US Liquids of Detroit, Inc (US Liquids) located at 1923 Frederick Street, Detroit, Michigan. Copies of the joint fact sheet and the public notice will be provided by the Michigan Department of Environmental Quality (MDEQ). The draft permit is based on the administrative record compiled by the United States Environmental Protection Agency (U.S. EPA).

The Federal portion of the RCRA permit contains those provisions and conditions applicable to US Liquids required by the Hazardous and Solid Waste Amendments of 1984 (HSWA) to RCRA for which the State of Michigan has not been authorized. Please read the draft Federal permit carefully; failure to meet any portion of the final permit could result in civil and/or criminal penalties.

The list of hazardous waste codes in your application included K178 Waste. This waste code is comprised of residues from manufacturing and manufacturing-site storage of ferric chloride from acids formed during the production of titanium dioxide using the chloride-ilmenite process. This waste code was not promulgated under HSWA and is not considered a hazardous waste under Federal RCRA regulations until the State of Michigan becomes authorized for it. Therefore, it is not included in the Federal portion of the US Liquids RCRA permit.

Under the provisions of Title 40 of the Code of Federal Regulations (40 CFR), Part 124, the draft permit and the administrative record must be publicly noticed and made available for public review. Copies of the administrative record log, public notice, permit information, and a fact sheet are available for review at the U.S. EPA office and MDEQ. The public comment

period will begin upon publication in a local newspaper by MDEQ of the notice of the draft license issuance.

During the public comment period, the Permittees or any interested party may submit comments to the U.S. EPA on the Federal portion of the draft RCRA permit. At the close of the comment period, the U.S. EPA will prepare a response to significant comments. Comments on the draft permit may be submitted to:

Waste Management Branch, DW-8J
Waste, Pesticides and Toxics Division
United States Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

ATTENTION: Mr. John Gaitskill

The U.S. EPA will issue a final permit decision after the close of the public comment period. Any person who filed comments on the draft permit, or participated in the public hearing, has 30 days after the service of notice of the Regional Administrator's action to petition the U.S. EPA to contest the final permit decision. The appeal process and limitations are addressed in 40 CFR § 124.19.

If you have any questions concerning this draft permit, please contact John Gaitskill of my staff, at (312) 886-6795.

Sincerely,

Jose G. Cisneros, Chief
Waste Management Branch
Waste, Pesticides and Toxics Division

Enclosures

cc: Steve Sliver, MDEQ